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BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D. C.

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U.S.-U.K. ALLIANCE CASE  
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: OST-2001-11029-6

MOTION OF BRITISH AIRWAYS PLC  
FOR CONFIDENTIAL TREATMENT

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November 23, 2001

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D. C.

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U.S.-U.K. ALLIANCE CASE  
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: OST-2001-11029

MOTION OF BRITISH AIRWAYS PLC  
FOR CONFIDENTIAL TREATMENT

British Airways Plc hereby moves that the Department withhold certain proprietary and commercially sensitive confidential information from public disclosure. Confidential documents -- namely, unredacted copies of documents previously submitted -- are being submitted today by British Airways, pursuant to Order 2001-11-10.<sup>1/</sup> An index of these materials is attached, in accordance with 14 C.F.R. § 302.12(d)(1)(i).

We are submitting four copy sets of the materials being produced today in sealed boxes labeled "Confidential Documents of British Airways Plc; Confidential Treatment Requested Under 14 C.F.R. § 302.12; Access Is Limited To Counsel Or Outside Experts Who Have Filed Proper Confidentiality Affidavits." These materials are highly sensitive internal corporate documents, studies, surveys, analyses, reports, and data, which should be accorded strictly limited access. Such


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<sup>1/</sup> A small number of documents previously produced by British Airways are not being produced in unredacted form because they contain information covered by the attorney-client privilege. These documents bear production numbers BA 859-912, 6693-6804, 6805-6817, 7033-7038, 7039-7046 and 7047-7049.

information is entitled to confidential treatment under 14 C.F.R. § 302.12 for all the reasons set forth in the initial joint motion for confidentiality submitted by American Airlines, Inc. and British Airways on August 10, 2001, which we incorporate herein by reference.

Accordingly, British Airways moves that the materials identified in the attached index be withheld from public disclosure and made available only to qualified affidavit holders, consistent with the Department's notice of August 21, 2001 and Order 2001-9-12, September 17, 2001.

Respectfully submitted,

  
PAUL C. JASINSKI  
General Counsel, Americas  
JAMES B. BLANEY  
Senior Counsel, Americas  
British Airways Plc

November 23, 2001

November 23, 2001

AMERICAN AIRLINES/BRITISH AIRWAYS ANTITRUST IMMUNITY APPLICATION

Index to Confidential Documents of British Airways Plc  
Confidential Treatment Requested Under 14 C.F.R. § 302.12; Access Is Limited to  
Counsel Or Outside Experts Who Have Filed Proper Confidentiality Affidavits

Box #	Unredacted Bates Range	Redacted Bates Range	Description/Title	Date	Specifi- cation
1	BA 0009034 – BA 0009050	BA 0003471 – BA 0003488	Minutes Board Meeting 8 June 2001	June 8, 2001	3, 6, 15, 18
1	BA 0009051 – BA 0009063	BA 0006535 – BA 0006547	Board Paper: Business Performance Report	December, 1999	4
1	BA 0009064 – BA 0009074	BA 0006550 – BA 0006560	BA Board Minutes	December 10, 1999	4
1	BA 0009075 – BA 0009087	BA 0006565 – BA 0006577	Board Paper: Business Performance Report	February, 2000	4
1	BA 0009088 – BA 0009100	BA 0006582 – BA 0006594	Board Paper: Business Performance Report	March, 2000	4
1	BA 0009101 – BA 0009112	BA 0006617 – BA 0006628	Board Paper: Business Performance Report	May, 2000	4
1	BA 0009113 – BA 0009124	BA 0006629 – BA 0006640	Board Paper: Business Performance Report	June, 2000	4
1	BA 0009125 – BA 0009131	BA 0006644 – BA 0006650	Board Paper: Interim Business Performance Report	July, 2000	4
1	BA 0009132 – BA 0009134	BA 0006655 – BA 0006657	BA Board Minutes	September 11, 2000	5
1	BA 0009135 – BA 0009147	BA 0006660 – BA 0006672	Board Paper: Business Performance Report	August, 2000	4
1	BA 0009148 – BA 0009165	BA 0006675 – BA 0006692	Board Paper: Business Performance Report	July, 2000	4
1	BA 0009166 – BA 0009172	BA 0006974 – BA 0006978B	BA Board Minutes	May 11, 2001	4
1	BA 0009173 – BA 0009180	BA 0006979 – BA 0006986	BA Board Minutes	April 6, 2001	4
1	BA 0009181 – BA 0009185	BA 0006987 – BA 0006991	BA Board Minutes	March 9, 2001	4
1	BA 0009186 – BA 0009193	BA 0006992 – BA 0006999	BA Board Minutes	November 3, 2000	4, 18
1	BA 0009194 – BA 0009226	BA 0007000 – BA 0007032	Board Paper: Group Business Plan 2001-05	March 9, 2001	4, 18
1	BA 0009227 – BA 0009239	BA 0007050 – BA 0007062	Board Paper: Business Performance Report	October, 2000	4

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1	BA 0009240 – BA 0009252	BA 0007063 – BA 0007075	Board Paper: Business Performance Report	September, 2000	4
1	BA 0009253 – BA 0009266	BA 0007076 – BA 0007089	Board Paper: Business Performance Report	December, 2000	4
1	BA 0009267 – BA 0009280	BA 0007090 – BA 0007103	Board Paper: Business Performance Report	February, 2001	4
1	BA 0009281 – BA 0009294	BA 0007104 – BA 0007117	Board Paper: Business Performance Report	March, 2001	4
1	BA 0009295 – BA 0009308	BA 0007118 – BA 0007131	Board Paper: Business Performance Report	April, 2001	4
1	BA 0009309 – BA 0009322	BA 0007132 – BA 0007145	Board Paper: Business Performance Report	May, 2001	4
1	BA 0009323 – BA 0009331	BA 0007146 – BA 0007154	Board Paper: Business Performance Report	June 1, 2001	4
1	BA 0009332 – BA 0009345	BA 0007155 – BA 0007168	Board Paper: Business Performance Report	January, 2001	4
1	BA 0009346 – BA 0009351	BA 0007169 – BA 0007174	BA Board Minutes	June 11, 1999	4
1	BA 0009352 – BA 0009356	BA 0007175 – BA 0007179	BA Board Minutes	July 2, 1999	4
1	BA 0009357 – BA 0009362	BA 0007180 – BA 0007185	BA Board Minutes	August 6, 1999	4
1	BA 0009363 – BA 0009380	BA 0007186 – BA 0007207	Board Paper: Business Performance Report	August, 1999	4
1	BA 0009381 – BA 0009408	BA 0007208 – BA 0007230	Board Paper: Business Performance Report	October, 1999	4
1	BA 0009409 – BA 0009421	BA 0007231 – BA 0007243	Board Paper: Business Performance Report	September, 1999	4
1	BA 0009422 – BA 0009451	BA 0007244 – BA 0007273	Board Paper: Corporate Plan 2000/2001	November 5, 1999	4
1	BA 0009452 – BA 0009464	BA 0008300 – BA 0008312	Revenue Appointment Agreement Between Aer Lingus, American Airlines, BA and Others	June 1, 2000	10(a)

## AMERICAN AIRLINES/BRITISH AIRWAYS ANTITRUST IMMUNITY APPLICATION

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Box #	Unredacted Bates Range	Redacted Bates Range	Description/Title	Date	Specifi- cation
1	BA 0009465 – BA 0009516	BA 0008313 – BA 0008364	Codesharing Agreement Between Aer Lingus Group & BA	November 18, 1999	10(a)
1	BA 0009517 – BA 0009559	BA 0008365 – BA 0008407	Participation Agreement Aer Lingus Group & BA	November 18, 1999	10(a)
1	BA 0009560 – BA 0009602	BA 0008408 – BA 0008450	Letter to Michael Gannon from Aarah Keyes	June 6, 2000	10(a)
1	BA 0009603 – BA 0009607	BA 0008483 – BA 0008487	Bilateral Prorate Agreement Between America West, America West Express & BA	September 7, 1999	10(a)
1	BA 0009608 – BA 0009650	BA 0008488 – BA 0008530	Participation Agreement: America West & BA	July 1, 1999	10(a)
1	BA 0009651 – BA 0009681	BA 0008531 – BA 0008562	Participation Agreement: Alaska Airlines & British Airways	January 1, 1999	10(a)
1	BA 0009682 – BA 0009684	BA 0008563 – BA 0008565	Special Prorate Agreement: BA & Alaska Airlines & Horizon Airlines	March 1, 1998	10(a)
1	BA 0009685 – BA 0009687	BA 0008566 – BA 0008568	Special Prorate Agreement: BA & Alaska Airlines & Horizon Airlines	March 1, 1998	10(a)
1	BA 0009688 – BA 0009724	BA 0008569 – BA 0008605	Codesharing Agreement Between Finnair Oyj & BA	June 4, 2001	10(a)
1	BA 0009725 – BA 0009793	BA 0008606 – BA 0008674	Participation Agreement: Finnair Oyj & BA	November, 2000	10(a)
1	BA 0009794 – BA 0009795	BA 0008675 – BA 0008676	Special Prorate Agreement Between BA & Malev Hungarian Airlines & Deutsche ba Luftf	August 1, 1998	10(a)
1	BA 0009796 – BA 0009834	BA 0008677 – BA 0008715	Codesharing Agreement: Malev Hungarian & BA	August 7, 1998	10(a)
1	BA 0009835 – BA 0009855	BA 0008716 – BA 0008736	Letter to Erno Gyevi-Toth from John Patterson	May 5, 1999	10(a)
1	BA 0009856 – BA 0009858	BA 0008745 – BA 0008747	Special Prorate Agreement: BA & Lot Polish Airlines	November 7, 1999	10(a)
1	BA 0009859 – BA 0009933	BA 0008748 – BA 0008822	Extension of Frequent Flyer Agreement Between British Airways and Lot Polish Airlines	September 28, 2000	10(a)

November 23, 2001

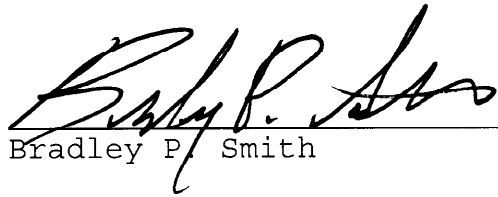
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Box #	Unredacted Bates Range	Redacted Bates Range	Description/Title	Date	Specifi- cation
1	BA 0009934 – BA 0010019	BA 0008823 – BA 0010019	Codesharing Agreement Between Lot Polish Airlines and British Airways	October 15, 1998	10(a)
1	BA 0010020 – BA 0010038	BA 0008909 – BA 0008928	Second Amendment to FFP Agreement Between British Airways Plc and Iberia	March 1, 2001	10(a)
1	BA 0010039 – BA 0010088	BA 0008929 – BA 0008980	Frequent Flyer Agreement Between Iberia and British Airways	February 12, 1999	10(a)
1	BA 0010089 – BA 0010141	BA 0008981 – BA 0009033	First Amendment to Codeshare Agreement Between British Airways and Iberia	September 30, 2000	10(a)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document by hand delivery or first-class mail on all persons named on the attached service list.

  
Bradley P. Smith

November 23, 2001



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